

# **ALMEDIS Privacy Policy: Key Points**



# General Provisions

- This Policy for the Processing of Personal Data (hereinafter referred to as the Data Processing Policy, DPP) SC ALMEDIS (hereinafter referred to as Almedis) has been developed in accordance with the Constitution of the Russian Federation, the Labor Code of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 149- FZ "On Information, Information Technologies and Information Protection", Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", RF Government Decree No. 1119 of 01.11.2012 "On Approval of the Requirements for Personal Data Protection While Processing by Personal Data Information Systems", other state laws and regulatory acts.
- DPP is designed to protect rights and freedoms of personal data subjects when processing/ working with their personal data (hereinafter - PD).
- DPP provisions form the basis for the procedures and processes governing processing of personal data of Almedis employees and other personal data subjects in Almedis.

# Objectives of PD Processing

- Almedis processes PD for the following purposes:
  - ✓ Compliance with the requirements of legislation in the sphere of labor and taxation;
  - ✓ Compliance with the requirements of legislation regarding the processing and protection of PD citizens who are contractors Almedis (hereinafter - PD subjects);
  - ✓ Other legitimate purposes

# Legal Basis for PD Processing

- PD processing is carried out in accordance with the laws of the Russian Federation.
- If required by the terms of a contract with an international company, legislative requirements of other countries, incl. US and EU, are considered for PD processing.

# List of Actions with PD

When processing PD, Almedis will perform the following actions with it:

- collection (PD can be obtained as paper-based or through information and telecommunication networks),
- recording,
- systematization,
- accumulation,
- storage,
- clarification (updating, modification),
- extraction,
- use,
- transfer (provision, access),
- blocking,
- deletion,
- PD destruction.

# Composition of Processed PD

- PD of the following PD subjects are to be processed by ALmedis:
  - Employees and affiliates of Almedis;
  - Counterparties / third parties
    - ✓ Any PD subject agrees for PD processing freely, by his/her own will and in his/her interest.
    - ✓ Almedis ensures compliance of the processed PD content and volume with the stated processing objectives.
- Processing of special categories of PD, relating to race, nationality, political views, religious or philosophical beliefs, intimate life, is not carried out in Almedis.

# PD Processing

- PD processing in Almedis is carried out in the following ways:
  - ✓ Non-automated PD processing;
  - ✓ Automated PD processing with the transfer of information with receipt through information and telecommunications networks or without it;
  - ✓ Mixed PD processing
- Almedis maintains a list of paper and electronic documents and (or) systems used in PD processing.

# Ensuring PD Protection When Processing by Almedis

- Almedis undertakes measures to ensure the execution of duties in PD processing, including:
  - ✓ Appointment of Almedis responsible person for organizing of PD processing;
  - ✓ Maintaining a policy and processes for PD processing;
  - ✓ Implementation of organizational and technical measures to ensure the PD safety;
  - ✓ Implementation of internal control over the compliance of the PD processing with legislative requirements, Almedis policies and procedures related to PD processing, other applicable requirements;
  - ✓ Familiarization of Almedis employees with the PD protection requirements
- During PD processing Almedis undertakes necessary legal, organizational and technical measures to protect PD from misconduct, and takes necessary measures for business activities recovery in case of emergency.



# The Right of a PD Subject for His/Her PD Access

- PD subject has the right to access his/her PD, processed by Almedis, to receive information regarding processing of his PD, as well as the right for measures for his/her rights protection in accordance with the law.
- PD subject has the right to protect his/her rights and legitimate interests, including compensation for damages and (or) compensation for moral damage in accordance with judicial procedures